UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

MICHELINA VARGAS and ANGEL VARGAS, SR.,

Plaintiffs,

CASE NUMBER: 1:11-cv-02600-BMC

-against-

ZIMMER, INC., ZIMMER HOLDINGS, INC., and ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.,

JURY TRIAL DEMANDED

Defendants.

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules Of Civil Procedure, the defendant, Zimmer Orthopaedic Surgical Products, Inc., states it is a wholly-owned subsidiary of Zimmer, Inc. Zimmer, Inc., is a wholly-owned subsidiary of Zimmer Holdings, Inc., which is a publicly held corporation. No other publicly held corporation owns 10% or more of Zimmer Orthopaedic Surgical Products, Inc.

DATED: August 3, 2011 Respectfully submitted,

/s/ Phoebe A. Wilkinson

Phoebe A. Wilkinson, PW-3143 CHADBOURNE & PARKE, LLP 30 Rockefeller Plaza New York, NY 10112

Telephone: (212) 408-1157 Facsimile: (646) 710-1157 pwilkinson@chadbourne.com

Attorneys for the defendants, Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Orthopaedic Surgical Products, Inc.

Of Counsel:

Andrea Roberts Pierson, Atty. No. 18435-49-A Haroon Anwar, Atty. No. 29135-5310 BAKER & DANIELS LLP 300 North Meridian Street, Suite 2700 Indianapolis, IN 46204 Telephone: (317) 237-0300

Facsimile: (317) 237-1000 andrea.pierson@bakerd.com haroon.anwar@bakerd.com